Roberts, Sarah

From: Roberts, Sarah
Sent: Wednesday, June 11, 2003 9:04 AM
To: Kruchek, David; Onyskiw, Denise
Cc: Kray, Edd; Gilbreath, Chris
Subject: FW: B771 Maint Shop PDS

Responses to comments 1, 2, 4, 5, and 6.
Chris Gilbreath will respond to Comments 3 and 7.
Please call me if you have further comments regarding my responses. Also, we can plan to meet this afternoon if necessary. We'd like to get comments resolved before Dave leave's town.

Thanks!

ADD verbiage to report.

1) The Building 771 Maintenance Shop is considered a Type 3 simply because it is physically attached to Building 771 (which is a Type 3 facility). However, there are some areas of Building 771 that do not meet the definition of a Class 1 survey unit. Several other areas of Building 771, including the Administration Area and Cafeteria, are Class 2 survey units as well, based on contamination potential. As such, the Maintenance Shop Proper will remain a Class 2 survey unit, which is supported by the data (i.e., no contamination in excess of the DCGLw was found in survey unit 771031).

2) The upper walls/roof of the Maintenance Shop is considered "Non-Impacted" (per Section 3.0 of the PDSP), because there is no reasonable potential for contamination. The Maintenance Shop was built in 1970, which is after the airborne contamination events on the site (Building 776 and Building 771 fires). Furthermore, there is no existing access to the upper walls/roof (no ladders).

→ Static / Scans / Smears only.

However, we initially considered the entire Maintenance Shop exterior as one survey unit, and collected fifteen (15) TSCs, smears, and media samples. No activity in excess of the DCGLw was detected. No activity (0 pCi/g) was identified in the media samples. This data is referred to as "characterization data" in the report. This is not part of the RLCR, rather supporting data included in the survey package.

This "non-impacted" classification will not be used for exterior portions of the building (774, 771 Proper) that existed before the fires, or for areas of the roof that can be accessed by personnel. As a matter of fact, this is one of the few instances where it is appropriate and defensible.

4) The MDAs for the detectors are determined *a priori*, and are as follows:

ADD to report Table of Values.

SAC-4 (smears) - 10 dpm/100 cm2
NE Electra DP6 (TSCs) - 48 dpm/100 cm2
NE Electra AP6 (hand scans) - 300 dpm/100 cm2
Bartlett Final Survey Monitor (automated scans) - 300 dpm/100 cm2 (with alarm set point at ~212 dpm/100 cm2)

I can add this information to the report if desired.

5) Refer to Column (A) of these attachments for the survey results. Column (B)-(A) represents the DCGLw minus the survey result, which is the statistic used for the Sign Test.

All results are less than the DCGLw.

7) The map included in Attachment F identifies the sample locations, which are all floor locations. The Beryllium Sampling Decision Tree (Figure 1 of the PDSP) was used to determine the number/type of sample locations. Because the Maintenance Shop was never a Beryllium area, we defaulted to the "Limited biased sampling (5 samples, minimum)", as directed by the flowchart.

→ ADD location description to Be Sampling

ADD Text

-----Original Message-----
From: Gilbreath, Chris
Sent: Wednesday, June 11, 2003 8:36 AM
To: Roberts, Sarah
Subject: FW: B771 Maint Shop PDS

-----Original Message-----

From: David Kruchek [SMTP:dakruche@smtpgate.dphe.state.co.us] <mailto: [SMTP:dakruche@smtpgate.dphe.state.co.us]>
Sent: Tuesday, June 10, 2003 4:23 PM
Cc: Denise Onyskiw; Steve Tarlton

→ not Be ACA
→ never handled Be

1/2

Subject: B771 Maint Shop PDS

Sara,

Have the following comments:

1) Please provide an explanation for the discrepancy between the statements that this is a Type 3 Facility and that it is a Class 2 Facility? If it has been identified in the RLCR as a Type 3 Facility then it should be investigated as a Class 1 Facility. If it was identified as a Type 2 Facility then it should be investigated as a Class 2 Facility. If it is a Type 3 Facility then this PDS is not sufficient and can not be approved.
2) Section 3 - The RLCR is only appropriate to Type the building. We only concur with the Typing, not with the results of the RLCR. The PDS is intended to stand alone, not as a supplement to the RLCR results. As such, utilizing the results of the RLCR is not necessarily sufficient for use as the PDS, unless the RLCR was performed per the requirements of the PDS. Therefore, please identify that the RLCR was performed to the PDS requirements or a PDS needs to be performed on the exterior upper walls and roof.
3) Since there has not been an investigation for Lead or other RCRA/CERCLA constituents, how can it be stated that the PDS results indicate that these do not exist in this building? Please change the wording to properly reflect the PDS investigation performed. — Verb. agl - add Attachment
4) Please provide the specific MDAs and dates for the instruments utilized.
5) Considering that the levels found appear to be above the DCGL, were these areas removed? Please provide an explanation of the levels above the DCGL shown in the Sign Test Calculation Worksheet for Unit 771031, Attachment B page 5 of 5, and Unit 771081, Attachment C page 4 of 4, etc.
6) Attachment F & Section 4.2 - All Be samples are supposed to identify the location of the sample. Please identify the location of all samples collected (Floor, light fixture, ceiling, etc) and indicate why they were collected at these locations rather than as indicated in the PDSP. Also, please explain why the minimum number of samples were collected rather than following the PDSP Section 4.3.2.
7) Please provide all relevant information necessary to review this document and support the statements made. This includes the HSA, since this is used to determine that samples need not be collected for RCRA/CERCLA Constituents and PCBs, and to otherwise determine the appropriate sampling for this facility.

David

771/774
Hazards Char. Report -

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